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of establishment of boundaries by acquiescence which prevents any controversy as to the true location of a boundary line if there has been an occupancy for the statutory period up to a marked division line without questioning its correctness. *Armear v. Richards*, 112 Iowa 657; *Kennedy v. Niles* (Iowa), 96 N. W. 772; *Griffith v. Murray*, 166 Iowa 380. The distinction between the results of the doctrine of adverse possession and those of acquiescence which were recognized in *Klinker v. Schmidt*, 114 Iowa 695, and *Bradley v. Burkhardt*, 139 Iowa 323, is strikingly illustrated by the principal case. The defendant contended that private title could not be secured by adverse possession of a railroad right of way, *Northern Pacific Railway Co. v. Townsend*, 190 U. S. 267; *Union Pacific Railroad Co. v. Laramie Stock-yard Co.*, 231 U. S. 190, 12 MICH. LAW REV. 144, 300; and further that plaintiff could not tack her possession to that of her grantor as her deed did not include the strip in controversy. *Gildea v. Warren*, 173 Mich. 28; 11 MICH. LAW REV. 245; *Lake Shore & M. S. Ry. Co. v. Sterling*, (Mich.) 155 N. W. 383, 15 MICH. LAW REV. 413. The court passes upon these contentions by saying that they are involved in the question of adverse possession but do not arise under the doctrine of acquiescence. The court holds that the same rules apply to a railroad corporation and a natural person and that the only element necessary to invoke the doctrine is acquiescence in an established boundary for the statutory period, privity of estate between the claimant and her grantor not being essential though it would be required to make the statutory period. See note in 21 L. R. A. 829, 834.

BULK SALES ACT—CHATTEL MORTGAGE AND RELEASE OF EQUITY OF REDEMPTION.—A grocer gave a chattel mortgage on his stock, together with a release of his equity of redemption. No notice to creditors was given as provided for in the Sales in Bulk Act, but there was no actual bad faith. *Held*, that the mortgagee had no rights as against a subsequently attaching creditor of the mortgagor. *Mills v. Sullivan*, (Mass. 1916) 111 N. E. 605.

The court found that the mortgage was not within the Act but that the effect of the mortgage and release together was to transfer the absolute legal title to the property and if allowed to be good would defeat the statute. In two other states where the question has arisen the courts have held that a chattel mortgage does not come within the Bulk Sales Acts. *Hannah and Hogg v. Ritcher Brewing Co.*, 149 Mich. 220, 112 N. W. 713, 12 L. R. A. (N. S.) 178, 119 Am. St. Rep. 674, 12 Ann. Cases 344; *Noble v. Ft. Smith Wholesale Grocery Co.*, 34 Okl. 662, 127 Pac. 14, 46 L. R. A. (N. S.) 455. In a note to the last case in 11 MICH. LAW REV. 248, it was pointed out that a chattel mortgage does not pass the legal title in Michigan or Oklahoma but that it does pass title in Massachusetts. It was there mentioned that the Oklahoma case suggested that in states where title is passed by a chattel mortgage it may well come within a Bulk Sales Act. Massachusetts, in holding that a simple chattel mortgage does not come within the Act, but that the transaction involved in the principal case does, would seem to indicate that it is the passing of the equity of redemption and not the bare legal title which brings the transaction within the Act.